

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

**IN RE: Acetaminophen – ASD-ADHD Products Liability
Litigation**

Docket No. 22-md-3043 (DLC)

This Document Relates To: *All Cases*

**DECLARATION OF ASHLEY C. KELLER IN SUPPORT OF
PLAINTIFFS' OPPOSITIONS TO DEFENDANTS' RULE 702 MOTIONS TO
EXCLUDE PLAINTIFFS' EXPERTS DRS. ANDREA BACCARELLI,
ROBERT CABRERA, ERIC HOLLANDER, STAN LOUIE, AND BRANDON PEARSON**

1. My name is Ashley C. Keller, and I am a partner at Keller Postman, LLC. I am Co-Lead Counsel for the Plaintiffs in this MDL. I declare under penalty of perjury that the below is true and correct.

2. Attached hereto as **Exhibit 1** is a true and correct copy of Amended Rule 26 Expert Report, Materials Considered, and *curriculum vitae* of Andrea Baccarelli, MD, PhD. Plaintiffs served this document on Defendants on June 23, 2023, in connection with this action.

3. Attached hereto as **Exhibit 2** is a true and correct copy of Amended Rule 26 Expert Report, Materials Considered, and *curriculum vitae* of Brandon Pearson, PhD. Plaintiffs served this document on Defendants on June 21, 2023, in connection with this action.

4. Attached hereto as **Exhibit 3** is a true and correct copy of Amended Rule 26 Expert Report, Materials Considered, and *curriculum vitae* of Robert Cabrera, PhD. Plaintiffs served this document on Defendants on June 22, 2023, in connection with this action.

5. Attached hereto as **Exhibit 4** is a true and correct copy of Amended Rule 26 Expert Report, Materials Considered, and *curriculum vitae* of Eric Hollander, MD, DFAPA, FACNP. Plaintiffs served this document on Defendants on June 23, 2023, in connection with this action.

6. Attached hereto as **Exhibit 5** is a true and correct copy of Amended Rule 26 Expert Report, Materials Considered, and *curriculum vitae* of Stan Louie, Pharm.D. Plaintiffs served this document on Defendants on June 21, 2023, in connection with this action.

7. Attached hereto as **Exhibit 6** is a true and correct copy of Rule 26 Rebuttal Expert Report of Andrea Baccarelli, MD, PhD. Plaintiffs served this document on Defendants on July 28, 2023, in connection with this action.

8. Attached hereto as **Exhibit 7** is a true and correct copy of Rule 26 Rebuttal Expert Report of Brandon Pearson, PhD. Plaintiffs served this document on Defendants on July 28, 2023, in connection with this action.

9. Attached hereto as **Exhibit 8** is a true and correct copy of Rule 26 Rebuttal Expert Report of Robert Cabrera, PhD. Plaintiffs served this document on Defendants on July 28, 2023, in connection with this action.

10. Attached hereto as **Exhibit 9** is a true and correct copy of Rule 26 Rebuttal Expert Report of Eric Hollander, MD, DFAPA, FACNP. Plaintiffs served this document on Defendants on July 28, 2023, in connection with this action.

11. Attached hereto as **Exhibit 10** is a true and correct copy of Rule 26 Rebuttal Expert Report of Stan Louie, Pharm.D. Plaintiffs served this document on Defendants on July 28, 2023, in connection with this action.

12. Attached hereto as **Exhibit 11** is a true and correct copy of Supplemental Rule 26 Expert Report of Brandon Pearson, PhD. Plaintiffs served this document on Defendants on July 17, 2023, in connection with this action.

13. Attached hereto as **Exhibit 12** is a true and correct copy of Supplemental Rule 26 Expert Report of Robert Cabrera, PhD. Plaintiffs served this document on Defendants on July 17, 2023, in connection with this action.

14. Attached hereto as **Exhibit 13** is a true and correct copy of Rule 26 Expert Disclosures of Jennifer Pinto-Martin, Ph.D., M.P.H., including her Report, list of materials reviewed and/or considered, and *curriculum vitae*. Defendants served this document on Plaintiffs on July 21, 2023, in connection with this action.

15. Attached hereto as **Exhibit 14** is a true and correct copy of Rule 26 Expert Disclosures of Wendy K. Chung, M.D., Ph.D., including her Report, list of materials reviewed and/or considered, and *curriculum vitae*. Defendants served this document on Plaintiffs on July 21, 2023, in connection with this action.

16. Attached hereto as **Exhibit 15** is a true and correct copy of Rule 26 Expert Disclosures of Mary E. D'Alton, M.D., including her Report, list of materials reviewed and/or considered, and *curriculum vitae*. Defendants served this document on Plaintiffs on July 21, 2023, in connection with this action.

17. Attached hereto as **Exhibit 16** is a true and correct copy of Rule 26 Expert Disclosures of Alexander Klevzon, M.D., including his Report, list of materials reviewed and/or considered, and *curriculum vitae*. Defendants served this document on Plaintiffs on July 21, 2023, in connection with this action.

18. Attached hereto as **Exhibit 17** is a true and correct copy of Rule 26 Expert Disclosures of Mitchell R. McGill, Ph.D., including his Report, list of materials reviewed and/or considered, and *curriculum vitae*. Defendants served this document on Plaintiffs on July 21, 2023, in connection with this action.

19. Attached hereto as **Exhibit 18** is a true and correct copy of Amended Rule 26 Expert Disclosures of Craig M. Powell, M.D., Ph.D., including his Report, list of materials reviewed and/or considered, and *curriculum vitae*. Defendants served this document on Plaintiffs on August 18, 2023, in connection with this action.

20. Attached hereto as **Exhibit 19** is a true and correct copy of Amended Rule 26 Expert Disclosures of Stephen V. Faraone, Ph.D., including his Report, list of materials reviewed and/or considered, and *curriculum vitae*. Defendants served this document on Plaintiffs on August 22, 2023, in connection with this action.

21. Attached hereto as **Exhibit 20** is a true and correct copy of the August 14, 2023 deposition transcript of Andrea Baccarelli.

22. Attached hereto as **Exhibit 21** is a true and correct copy of the August 11, 2023 deposition transcript of Brandon Pearson.

23. Attached hereto as **Exhibit 22** is a true and correct copy of the August 3, 2023 deposition transcript of Robert Cabrera.

24. Attached hereto as **Exhibit 23** is a true and correct copy of the August 9, 2023 deposition transcript of Eric Hollander.

25. Attached hereto as **Exhibit 24** is a true and correct copy of the August 5, 2023 deposition transcript of Stan Louie.

26. Attached hereto as **Exhibit 25** is a true and correct copy of the September 6, 2023 deposition transcript of Jennifer Pinto-Martin.

27. Attached hereto as **Exhibit 26** is a true and correct copy of the August 30, 2023 deposition transcript of Wendy Chung.

28. Attached hereto as **Exhibit 27** is a true and correct copy of the September 8, 2023 deposition transcript of Mary D’Alton.

29. Attached hereto as **Exhibit 28** is a true and correct copy of the September 1, 2023 deposition transcript of Alexander Kolevzon.

30. Attached hereto as **Exhibit 29** is a true and correct copy of the September 8, 2023 deposition transcript of Mitchell McGill.

31. Attached hereto as **Exhibit 30** is a true and correct copy of the August 28, 2023 deposition transcript of Craig Powell.

32. Attached hereto as **Exhibit 31** is a true and correct copy of the September 7, 2023 deposition transcript of Stephen Faraone.

33. Attached hereto as **Exhibit 32** is a true and correct copy of the May 25, 2023 deposition transcript of Carolyn Jeffcoat.

34. Attached hereto as **Exhibit 33** is a true and correct copy of Christina Ricci et al., *In Utero Acetaminophen Exposure and Child Neurodevelopmental Outcomes: Systematic Review and Meta-Analysis*, Paediatric & Perinatal Epidemiology 473 (2023), which was Exhibit 615 to the September 6, 2023 deposition of Dr. Jennifer Pinto-Martin.

35. Attached hereto as **Exhibit 34** is a true and correct copy of Tracey J. Woodruff & Patrice Sutton, *The Navigation Guide Systematic Review Methodology: A Rigorous and Transparent Method for Translating Environmental Health Science into Better Health Outcomes*, 122 Env’t Health Perspectives 1007 (2014).

36. Attached hereto as **Exhibit 35** is a true and correct copy of Federal Judicial Center, *Reference Manual on Scientific Evidence* (3d ed. 2011), which was Exhibit 605 to the September 6, 2023 deposition of Dr. Jennifer Pinto-Martin.

37. Attached hereto as **Exhibit 36** is a true and correct copy of ADHD Forest Plot Demonstrative, which was Exhibit 633 to the September 6, 2023 deposition of Dr. Jennifer Pinto-Martin.

38. Attached hereto as **Exhibit 37** is a true and correct copy of Silvia Alemany et al., *Prenatal and Postnatal Exposure to Acetaminophen in Relation to Autism Spectrum and Attention-Deficit and Hyperactivity Symptoms in Childhood: Meta-analysis in Six European Population-Based Cohorts*, 36 Eur. J. Epidemiology 993 (2021), which was Exhibit 612 to the September 6, 2023 deposition of Dr. Jennifer Pinto-Martin.

39. Attached hereto as **Exhibit 38** is a true and correct copy of a forest plot of a selection of scientific studies relating to acetaminophen and autism spectrum disorder, which was Exhibit 634 to the September 6, 2023 deposition of Dr. Jennifer Pinto-Martin.

40. Attached hereto as **Exhibit 39** is a true and correct copy of Claudia Avella-Garcia et al., *Acetaminophen Use in Pregnancy and Neurodevelopment: Attention Function and Autism Spectrum Symptoms*, 45 Int'l J. Epidemiology 1987 (2016).

41. Attached hereto as **Exhibit 40** is a true and correct copy of No Acetaminophen/Yes Acetaminophen demonstrative, which was Exhibit 637 to the September 6, 2023 deposition of Dr. Jennifer Pinto-Martin.

42. Attached hereto as **Exhibit 41** is a true and correct copy of First, Second and Third Tertile Cord APAP demonstrative, which was Exhibit 638 to the September 6, 2023 deposition of Dr. Jennifer Pinto-Martin.

43. Attached hereto as **Exhibit 42** is a true and correct copy of Jørn Olsen & Zeyan Liew, *Fetal Programming of Mental Health by Acetaminophen? Response to the SMFM*

Statement: Prenatal Acetaminophen Use and ADHD, 16 Expert Op. Drug Safety 1395 (2017), which was Exhibit 609 to the September 6, 2023 deposition of Dr. Jennifer Pinto-Martin.

44. Attached hereto as **Exhibit 43** is a true and correct copy of Ann Z. Bauer et al., *Prenatal Paracetamol Exposure and Child Neurodevelopment: A Review*, 101 Hormonal Behav. 125 (2018), which was Exhibit 618 to the September 6, 2023 deposition of Dr. Jennifer Pinto-Martin.

45. Attached hereto as **Exhibit 44** is a true and correct copy of Zeyan Liew et al., *Acetaminophen Use During Pregnancy, Behavioral Problems, and Hyperkinetic Disorders*, 168 JAMA Pediatrics 313 (2014).

46. Attached hereto as **Exhibit 45** is a true and correct copy of Zeyan Liew et al., *Maternal Use of APAP During Pregnancy and Risk of Autism Spectrum Disorders in Childhood: A Danish National Birth Cohort Study*, 9 Autism Rsch. 951 (2016), which is referred to in the Oppositions as Liew (2016a).

47. Attached hereto as **Exhibit 46** is a true and correct copy of Yuelong Ji et al., *Association of Cord Plasma Biomarkers of In Utero Acetaminophen Exposure With Risk of Attention-Deficit/Hyperactivity Disorder and Autism Spectrum Disorder in Childhood*, 77 JAMA Psychiatry 180 (2020).

48. Attached hereto as **Exhibit 47** is a true and correct copy of Science Advisory Board Meeting Transcript, National Center for Toxicological Research (2022), which was Exhibit 622 to the September 6, 2023 deposition of Dr. Jennifer Pinto-Martin.

49. Attached hereto as **Exhibit 48** is a true and correct copy of Prenatal APAP Use Demonstrative, which was Exhibit 632 to the September 6, 2023 deposition of Dr. Jennifer Pinto-Martin.

50. Attached hereto as **Exhibit 49** is a true and correct copy of Alex Kolevzon, *Diagnosis and Treatment of Autism: the Real Story*, BioMed Central (Apr. 3, 2018), <https://blogs.biomedcentral.com/on-biology/2018/04/03/diagnosis-treatment-autism-real-story/>.

51. Attached hereto as **Exhibit 50** is a true and correct copy of Evie Stergiakouli et al., *Association of Acetaminophen Use During Pregnancy with Behavioral Problems in Childhood Evidence Against Confounding*, 170 JAMA Pediatrics 964 (2016), which was Exhibit 611 to the September 6, 2023 deposition of Dr. Jennifer Pinto-Martin.

52. Attached hereto as **Exhibit 51** is a true and correct copy of Ragnhild Eek Brandlistuen, et al., *Prenatal paracetamol exposure and child neurodevelopment: a sibling-controlled cohort study*, 42 International Journal of Epidemiology (2013), which was Exhibit 626 to the September 6, 2023 deposition of Dr. Jennifer Pinto-Martin.

53. Attached hereto as **Exhibit 52** is a true and correct copy of Kristin Gustavson et al., *Acetaminophen Use During Pregnancy and Offspring Attention Deficit Hyperactivity Disorder: A Longitudinal Sibling Control Study*, JCPP Advances (2021), which was Exhibit 627 to the September 6, 2023 deposition of Dr. Jennifer Pinto-Martin.

54. Attached hereto as **Exhibit 53** is a true and correct copy of the email thread between Isiah Ahmed, Agnieszka Majchero-Dann, and Rachel Weinstein (2014), which Johnson & Johnson Consumer, Inc. produced as bates-stamp APAP-JJCI0000294801.

55. Attached hereto as **Exhibit 54** is a true and correct copy of Xiaoyun Gou et al., *Association of Maternal Prenatal Acetaminophen Use with the Risk of Attention Deficit/Hyperactivity Disorder in Offspring: A Meta-Analysis*, 53 Aus. & N.Z. J. Psychiatry 195 (2019), which was Exhibit 610 to the September 6, 2023 deposition of Dr. Jennifer Pinto-Martin.

56. Attached hereto as **Exhibit 55** a true and correct copy of the email thread between Isiah Ahmed and Ryan Agramon (2014), which Johnson & Johnson Consumer, Inc. produced as bates-stamp APAP-JJCI-0000008545.

57. Attached hereto as **Exhibit 56** is a true and correct copy of Prescribing Information, Depakote ER- divalproex sodium tablet, extended release, AbbVie, Inc. (Initial U.S. approval 2000), which was Exhibit 619 to the September 6, 2023 deposition of Dr. Jennifer Pinto-Martin.

58. Attached hereto as **Exhibit 57** is a true and correct copy of Wendy Chung, Transcript of Presentation at TED: *Autism – What We Know (And What We Don’t Know Yet)* (March 2014).

59. Attached hereto as **Exhibit 58** is a true and correct copy of Jakob Christensen et al., *Prenatal Valproate Exposure and Risk of Autism Spectrum Disorders and Childhood Autism*, 309 JAMA Network Open 1696 (2013).

60. Attached hereto as **Exhibit 59** is a true and correct copy of Jakob Christensen, et al., *Association of Prenatal Exposure to Valproate and Other Antiepileptic Drugs with Risk for Attention-Deficit / Hyperactivity Disorder in Offspring*, 2 JAMA Network Open 1 (2019), which was Exhibit 621 to the September 6, 2023 deposition of Dr. Jennifer Pinto-Martin.

61. Attached hereto as **Exhibit 60** is a true and correct copy of David Garabrant et al., *Asbestos and Colon Cancer: Lack of Association in a Large Case-Control Study*, 135 Am. J. Epidemiology 843 (1992).

62. Attached hereto as **Exhibit 61** is a true and correct copy of William Weiss, *Asbestos and Colorectal Cancer*, 99 Gastroenterology 876 (1990).

63. Attached hereto as **Exhibit 62** is a true and correct copy of the email thread between Rachel Weinstein and Jørn Olsen (2014), which was Exhibit 10 to the May 19, 2023 deposition of Dr. Rachel Weinstein.

64. Attached hereto as **Exhibit 63** is a true and correct copy of Chapter 2 of Timothy Lash et al., *Modern Epidemiology* (4th ed. 2021), which was Exhibit 623 to the September 6, 2023 deposition of Dr. Jennifer Pinto-Martin.

65. Attached hereto as **Exhibit 64** is a true and correct copy of the email thread between Rachel Weinstein and Jesse Berlin (2018), which Johnson & Johnson Consumer, Inc. produced as bates-stamp APAP-JJCI-0000013368.

66. Attached hereto as **Exhibit 65** is a true and correct copy of Reem Masarwa et al., *Prenatal Exposure to Acetaminophen and Risk for Attention-Deficit Hyperactivity Disorder and Autism Spectrum Disorder: A Systematic Review, Meta-Analysis, and Meta-Regression Analysis of Cohort Studies*, 187 Am. J. Epidemiology 1817 (2018).

67. Attached hereto as **Exhibit 66** a true and correct copy of Yuelong Ji et al., *Maternal Biomarkers of Acetaminophen Use and Offspring Attention Deficit Hyperactivity Disorder*, 8 Brain Scis. 127 (2018).

68. Attached hereto as **Exhibit 67** is a true and correct copy of Department of Health and Human Services, *The Health Consequences of Involuntary Exposure to Tobacco Smoke* 436 (2006).

69. Attached hereto as **Exhibit 68** is a true and correct copy of Secondhand Smoke Demonstrative, which was Exhibit 636 to the September 6, 2023 deposition of Dr. Jennifer Pinto-Martin.

70. Attached hereto as **Exhibit 69** is a true and correct copy of Austin Bradford Hill, *The Environment and Disease: Association or Causation?*, 58 Procs. Royal Soc’y Med. 295 (1965), which was Exhibit 631 to the September 6, 2023 deposition of Dr. Jennifer Pinto-Martin.

71. Attached hereto as **Exhibit 70** is a true and correct copy of Ann Z. Bauer et al., *Consensus Statement, Paracetamol Use During Pregnancy – A Call for Precautionary Action*, Nature Revs. Endocrinology (2021).

72. Attached hereto as **Exhibit 71** is a true and correct copy of Brennan H. Baker et al., *Association of Prenatal Acetaminophen Exposure Measured in Meconium with Risk of Attention-Deficit/Hyperactivity Disorder Mediated by Frontoparietal Network Brain Connectivity*, 174 JAMA Pediatrics 1073 (2020), which was Exhibit 630 to the September 6, 2023 deposition of Dr. Jennifer Pinto-Martin.

73. Attached hereto as **Exhibit 72** is a true and correct copy of Salvador Mari-Bauset et al., *Endocrine Disruptors and Autism Spectrum Disorder in Pregnancy: A Review and Evaluation of the Quality of the Epidemiological Evidence*, 5 Child. (Basel) 157 (2018).

74. Attached hereto as **Exhibit 73** is a true and correct copy of Juleen Lam et al., *Developmental PBDE Exposure and IQ/ADHD in Childhood: A Systematic Review and Meta-analysis*, 125 Env’t Health Perspectives 086001-1 (2017).

75. Attached hereto as **Exhibit 74** is a true and correct copy of Paula I. Johnson et al., *Application of the Navigation Guide Systematic Review Methodology to the Evidence for Developmental and Reproductive Toxicity of Triclosan*, 92 Env’t Int’l 716 (2016).

76. Attached hereto as **Exhibit 75** is a true and correct copy of Jeff Gerth & T. Christian Miller, *Use Only as Directed*, ProPublica, Sept. 20, 2013, <https://www.propublica.org/article/tylenol-mcneil-fda-use-only-as-directed>.

77. Attached hereto as **Exhibit 76** is a true and correct copy of *Modernizing FDA's Regulation of Over-the-Counter Drugs: Hr'g Before the Subcomm. on Health, House Energy & Com. Comm.*, U.S. House of Representatives (2017) (Test. of Janet Woodcock, M.D., Dir., Ctr. for Drug Evaluation & Rsch., FDA, Dep't Health & Human Servs.).

78. Attached hereto as **Exhibit 77** is a true and correct copy of C.G. Bornehag et al., *Prenatal Exposure to Acetaminophen and Children's Language Development at 30 Months*, 51 *Eur. Psychiatry* 98 (2018).

79. Attached hereto as **Exhibit 78** is a true and correct copy of D.A. Edelman, *Exposure to Asbestos and the Risk of Gastrointestinal Cancer: A Reassessment*, 45 *British J. Indus. Med.* (1988).

80. Attached hereto as **Exhibit 79** is a true and correct copy of *Prescription Drug Products Containing Acetaminophen; Actions to Reduce Liver Injury from Unintentional Overdose*, 76 *Fed. Reg.* 2681 (Jan. 14, 2011).

81. Attached hereto as **Exhibit 80** is a true and correct copy of the Appendix to Kristin Gustavson et al., *Acetaminophen Use During Pregnancy and Offspring Attention Deficit Hyperactivity Disorder – A Longitudinal Sibling Control Study*, 1 *JCPP Advances* 1 (2021), which was Exhibit 628 to the September 6, 2023 deposition of Dr. Jennifer Pinto-Martin.

82. Attached hereto as **Exhibit 81** is a true and correct copy of M. Hornig et al., *Prenatal Fever and Autism Risk*, 23 *Molecular Psychiatry* 759 (2018).

83. Attached hereto as **Exhibit 82** is a true and correct copy of Beate Leppert et al., *Association of Maternal Neurodevelopmental Risk Alleles with Early-Life Exposures*, 76 *JAMA Psychiatry* 834 (2019).

84. Attached hereto as **Exhibit 83** is a true and correct copy of Zeyan Liew et al., *Use of Negative Control Exposure Analysis to Evaluate Confounding: An Example of Acetaminophen Exposure and Attention-Deficit/Hyperactivity Disorder in Nurses' Health Study II*, 188 Am. J. Epidemiology 768 (2019).

85. Attached hereto as **Exhibit 84** is a true and correct copy of Alexandra Saunders et al., *A Comparison of Prenatal Exposures in Children with and without a Diagnosis of Autism Spectrum Disorder*, 11 Cureus 1 (2019).

86. Attached hereto as **Exhibit 85** is a true and correct copy of Eivind Ystrom et al., *Prenatal Exposure to Acetaminophen and Risk of ADHD*, 140 Pediatrics 1 (2017).

87. Attached hereto as **Exhibit 86** is a true and correct copy of Press Release, U.S. Senate Committee on Finance, *Grassley Urges FDA to Educate and Inform Public About Acetaminophen* (Mar. 20, 2007).

88. Attached hereto as **Exhibit 87** is a true and correct copy of Prescribing Information for Nexium, U.S. Food and Drug Administration (2021).

89. Attached hereto as **Exhibit 88** a true and correct copy of excerpts from the May 19, 2023 deposition transcript of Rachel Weinstein.

90. Attached hereto as **Exhibit 89** is a true and correct copy of Eric Barnett et al., *Identifying Pediatric Mood Disorders from Transdiagnostic Polygenic Risk Scores: A Study of Children and Adolescents*, 83 J. Clinical Psychiatry 3 (2022).

91. Attached hereto as **Exhibit 90** is a true and correct copy of Joseph Biederman et al., *The Child Behavior Checklist Can Aid in Characterizing Suspected Comorbid Psychopathology in Clinically Referred Youth with ADHD*, 138 J. Psychiatric Rsch. 477 (2021).

92. Attached hereto as **Exhibit 91** is a true and correct copy of Ditte Demontis et al., *Genome-Wide Analyses of ADHD Identify 27 Risk Loci, Refine the Genetic Architecture and Implicate Several Cognitive Domains*, 55 *Nature Genetics* 198 (2023).

93. Attached hereto as **Exhibit 92** is a true and correct copy of Ellen Doernberg & Eric Hollander, *Neurodevelopmental Disorders (ASD and ADHD): DSM-5, ICD-10, and ICD-11*, 21 *CNS Spectrums* 295 (2016).

94. Attached hereto as **Exhibit 93** is a true and correct copy of Stephen Faraone et al., *The World Federation of ADHD International Consensus Statement: 208 Evidence-based Conclusions About the Disorder*, 128 *Neuroscience & Biobehavioral Revs.* 789 (2021).

95. Attached hereto as **Exhibit 94** is a true and correct copy of Kevin Antshel et al., *The Comorbidity of ADHD and Autism Spectrum Disorder*, 13 *Expert Rev. of Neurotherapeutics* 1117 (2013), which was Exhibit 777 to the September 7, 2023 deposition of Stephen Faraone.

96. Attached hereto as **Exhibit 95** is a true and correct copy of Nayla Khoury et al., *From Structural Disparities to Neuropharmacology: A Review of Adult Attention-Deficit/Hyperactivity Disorder Medication Treatment*, 31 *Child & Adolescent Psychiatric Clinics of N. Am.* 343 (2022), which was Exhibit 784 to the September 7, 2023 deposition of Stephen Faraone.

97. Attached hereto as **Exhibit 96** is a true and correct copy of Nidhin Joseph et al., *Oxidative Stress and ADHD: A Meta-Analysis*, 19 *J. Attention Disorders* 915 (2015), which was Exhibit 785 to the September 7, 2023 deposition of Stephen Faraone.

98. Attached hereto as **Exhibit 97** is a true and correct copy of Stephen Faraone & Henrik Larsson, *Genetics of Attention Deficit Hyperactivity Disorder*, 24 *Molecular Psychiatry* 562 (2019).

99. Attached hereto as **Exhibit 98** is a true and correct copy of an excerpt of *Textbook of Autism Spectrum Disorders* (Eric Hollander et al. eds., 2d ed. 2022), which was Exhibit 494 to the September 1, 2023 deposition of Alex Kolevzon.

100. Attached hereto as **Exhibit 99** is a true and correct copy of Rebecca Jones & Catherine Lord, *Diagnosing Autism in Neurobiological Research Studies*, 251 *Behav. Brain Rsch.* 113 (2013).

101. Attached hereto as **Exhibit 100** is a true and correct copy of Azadeh Kushki et al., *Examining Overlap and Homogeneity in ASD, ADHD, and OCD: a Data-Driven, Diagnosis-Agnostic Approach*, 9 *Translational Psychiatry* 319 (2019).

102. Attached hereto as **Exhibit 101** is a true and correct copy of Alex Lau-Zhu et al., *Overlaps and Distinctions Between Attention Deficit/Hyperactivity Disorder and Autism Spectrum Disorder in Young Adulthood: Systematic Review and Grading Framework for EEG-Imaging Research*, 96 *Neuroscience & Biobehavioral Revs.* 93 (2019).

103. Attached hereto as **Exhibit 102** is a true and correct copy of Manuel Mattheisen et al., *Identification of Shared and Differentiating Genetic Architecture for Autism Spectrum Disorder, Attention-Deficit Hyperactivity Disorder and Case Subgroups*, 54 *Nature Genetics* 1470 (2022).

104. Attached hereto as **Exhibit 103** is a true and correct copy of Deborah Morris-Rosendahl & Marc-Antoine Crocq, *Neurodevelopmental Disorders – the History and Future of a Diagnostic Concept*, 22 *Dialogues Clinical Neuroscience* 65 (2020).

105. Attached hereto as **Exhibit 104** is a true and correct copy of Nichole Scheerer et al., *Transdiagnostic Patterns of Sensory Processing in Autism and ADHD*, *J. of Autism & Developmental Disorders* (2022).

106. Attached hereto as **Exhibit 105** is a true and correct copy of John Thompson et al., *Associations Between Acetaminophen Use During Pregnancy and ADHD Symptoms Measured at Ages 7 and 11 Years*, 9 PloS ONE 1 (2014).

107. Attached hereto as **Exhibit 106** is a true and correct copy of Luciana Tovo-Rodrigues et al., *Low Neurodevelopmental Performance and Behavioural/Emotional Problems at 24 and 48 Months in Brazilian Children Exposed to Acetaminophen During Foetal Development*, 34 Peadiatric Perinatal Epidemiology 278 (2020).

108. Attached hereto as **Exhibit 107** is a true and correct copy of Marlee Vandewouw et al., *Identifying Replicable Subgroups in Neurodevelopmental Conditions Using Resting-State Functional Magnetic Resonance Imaging Data*, 6 JAMA Network Open 1 (2023).

109. Attached hereto as **Exhibit 108** is a true and correct copy of Richelle Vlenterie et al., *Neurodevelopmental Problems at 18 Months Among Children Exposed to Paracetamol in Utero: a Propensity Score Matched Cohort Study*, 45 Int'l J. Epidemiology 1998 (2016).

110. Attached hereto as **Exhibit 109** is a true and correct copy of Johnson & Johnson Consumer, Inc., *Review of Cases Reporting In-Utero Exposure and Neurocognitive/Neurodevelopmental Issues with the Use of Paracetamol* (Nov. 6, 2018), which Johnson & Johnson Consumer, Inc. produced as bates-stamp APAP-JJCI-0000075051 and was Exhibit 80 to the June 1, 2023 deposition of Islah Ahmed.

111. Attached hereto as **Exhibit 110** is a true and correct copy of a printable excerpt from the Project Cocoon Data Extraction spreadsheet, which Johnson & Johnson Consumer, Inc. produced as bates-stamp APAP-JJCI-0000525829.

112. Attached hereto as **Exhibit 111** is a true and correct copy of the Project Cocoon Data Extraction spreadsheet, which Johnson & Johnson Consumer, Inc. produced as bates-stamp APAP-JJCI-0000525829.

113. Attached hereto as **Exhibit 112** is a true and correct copy of Johnson & Johnson, Presentation to Safety Management Team on Signals Originating from Aggregate Data Review for January 1, 2021 to June 30, 2021 for Analgesic Products, OCHM Consumer Medicinal Signal Detection and Management (Aug. 2021), which Johnson & Johnson Consumer, Inc. produced as bates-stamp APAP-JJCI-0000806985.

114. Attached hereto as **Exhibit 113** is a true and correct copy of National Institute of Mental Health, *About RDoC*, Research Domain Criteria Initiative (RDoC), <https://www.nimh.nih.gov/research/research-funded-by-nimh/rdoc/about-rdoc> (last visited Oct. 9, 2023).

115. Attached hereto as **Exhibit 114** is a true and correct copy of emails between Rachel Weinstein, Amisha Parikh-Das, and Jacob Anupama dated Nov. 7-8, 2022, which Johnson & Johnson Consumer, Inc. produced as bates-stamp APAP-JJCI-0000013162 to -0000013163.

116. Attached hereto as **Exhibit 115** is a true and correct copy of emails between Rachel Weinstein, Amisha Parikh-Das, and Jacob Anupama dated Nov. 7-8, 2022, which Johnson & Johnson Consumer, Inc. produced as bates-stamp APAP-JJCI-0000013619 to -0000013620.

117. Attached hereto as **Exhibit 116** is a true and correct copy of ChemRisk, *Draft Overview of Toxicological Data and Assessment of Paracetamol (Acetaminophen)* (Jan. 10, 2023), which Johnson & Johnson Consumer, Inc. produced as bates-stamp APAP-JJCI-0000518712.

118. Attached hereto as **Exhibit 117** is a true and correct copy of National Institute of Mental Health, *Project Search Results*, Research Domain Criteria Initiative,

<https://reporter.nih.gov/search/fE7cCPvwBUqTXhM0gW-Mvg/projects/charts?shared=true> (last visited Oct. 10, 2023).

119. Attached hereto as **Exhibit 118** is a true and correct copy of National Institute of Mental Health, *RDoC Unit of Analysis: Self-Reports*, Research Domain Criteria Initiative, <https://www.nimh.nih.gov/research/research-funded-by-nimh/rdoc/units/self-reports> (last visited Oct. 9, 2023).

120. Attached hereto as **Exhibit 119** is a true and correct copy of National Institute of Mental Health, *RDoC Unit of Analysis: Units of Analysis*, Research Domain Criteria Initiative, <https://www.nimh.nih.gov/research/research-funded-by-nimh/rdoc/units> (last visited Oct. 9, 2023).

121. Attached hereto as **Exhibit 120** is a true and correct copy of excerpts from the May 24, 2023 deposition transcript of Edwin Kuffner.

122. Attached hereto as **Exhibit 121** is a true and correct copy of Rich Stoner et al., *Patches of Disorganization in the Neocortex of Children with Autism*, 370 New Eng. J. Med. 1209 (2014).

123. Attached hereto as **Exhibit 122** is a true and correct copy of ChemRisk, *Draft Overview of Toxicological Data and Assessment of Paracetamol (Acetaminophen)* (Feb. 8, 2023), which was Exhibit 216 to the August 28, 2023 deposition of Dr. Craig Powell.

124. Attached hereto as **Exhibit 123** is a true and correct copy of National Center for Toxicological Research, Tr. Science Advisory Board Meeting (May 19, 2022), which was Exhibit 225 to the August 28, 2023 deposition of Dr. Craig Powell.

125. Attached hereto as **Exhibit 124** is a true and correct copy of Zeyan Liew et al., *Prenatal Use of Acetaminophen and Child IQ, A Danish Cohort Study*, 27 Epidemiology 912 (2016), which is referred to in the Oppositions as Liew (2016b).

126. Attached hereto as **Exhibit 125** is a true and correct copy of emails between Michael Southall, Michael Kovochich, Evren Atillasoy, and Matthew Johnson dating from January 12, 2023 to February 3, 2023, which Johnson & Johnson Consumer, Inc. produced as bates-stamp APAP-JJCI-0000756328.

127. Attached hereto as **Exhibit 126** is a true and correct copy of Project Cocoon Update Presentation (Jan. 20, 2023), which Johnson & Johnson Consumer, Inc. produced as bates-stamp APAP-JJCI-0000518704.

128. Attached hereto as **Exhibit 127** is a true and correct copy of Project Cocoon ASD Presentation (Dec. 12, 2022), which Johnson & Johnson Consumer, Inc. produced as bates-stamp APAP-JJCI-0000065537.

129. Attached hereto as **Exhibit 128** is a true and correct copy of Kealan Pugsley et al., *Environmental Exposures Associated with Elevated Risk for Autism Spectrum Disorder May Augment the Burden of Deleterious de Novo Mutations Among Probands*, 27 Molecular Psychiatry 710 (2022).

130. Attached hereto as **Exhibit 129** is a true and correct copy of Brennan H. Baker, et al., *Sex-Specific Neurobehavioral and Prefrontal Cortex Gene Expression Alterations Following Developmental Acetaminophen Exposure in Mice*, 177 Neurobiology of Disease 1 (2023).

131. Attached hereto as **Exhibit 130** is a true and correct copy of Johnson & Johnson, *Draft Review of Nonclinical Endocrine, Developmental, and Reproductive Data on*

Acetaminophen (Nov. 30, 2022), which Johnson & Johnson Consumer, Inc. produced as bates-stamp APAP-JJCI-0000065450.

132. Attached hereto as **Exhibit 131** is a true and correct copy of Rochelle W. Tyl, et al., *Identification and interpretation of developmental neurotoxicity effects: A report from the ILSI Research Foundation/Risk Science Institute expert working group on neurodevelopmental endpoints*, 30 *Neurotoxicology & Teratology* 349 (2008).

133. Attached hereto as **Exhibit 132** is a true and correct copy of Virginia Moser et al., *Developmental Neurotoxicity Study*, North America Free Trade Agreement, Technical Working Groups on Pesticides (2016).

134. Attached hereto as **Exhibit 133** is a true and correct copy of Jimmie Leppink et al., *Evidence Against vs. in Favour of a Null Hypothesis*, 6 *Persps. Med. Educ.* 115 (2017).

135. Attached hereto as **Exhibit 134** is a true and correct copy of an excerpt from David Michaels, *Doubt Is Their Product: How Industry's Assault on Science Threatens Your Health* (2008).

136. Attached hereto as **Exhibit 135** is a true and correct copy of Kamilla Blecharz-Klin et al., *Effect of Prenatal and Early Life Paracetamol Exposure on the Level of Neurotransmitters in Rats – Focus on the Spinal Cord*, 47 *Int'l J. Developmental Neuroscience* 133 (2015).

137. Attached hereto as **Exhibit 136** is a true and correct copy of Kamilla Blecharz-Klin et al., *Paracetamol – Effect of Early Exposure on Neurotransmission, Spatial Memory and Motor Performance in Rats*, *Behavioral Brain Research* (2017).

138. Attached hereto as **Exhibit 137** is a true and correct copy of Abdulaziz S. Saeedan et al., *Effect of Early Natal Supplementation of Paracetamol on Attenuation of Exotoxin/Endotoxin*

Induced Pyrexia and Precipitation of Autistic Like Features in Albino Rats, 26 Inflammopharmacology 951 (2018).

139. Attached hereto as **Exhibit 138** is a true and correct copy of Sangseok Lee & Dong Kyu Lee, *What is the Proper Way to Apply the Multiple Comparison Test?*, 71 Kor. J. Anesthesiology 353 (2018).

140. Attached hereto as **Exhibit 139** is a true and correct copy of the Redlined Version of the Amended Rule 26 Expert Report of Craig M. Powell, M.D., Ph.D., which was Exhibit 201 to the August 28, 2023 deposition of Dr. Craig Powell.

141. Attached hereto as **Exhibit 140** is a true and correct copy of emails between Brandon Pearson and John Talpos dated March 20, 2023, which was Exhibit 213 to the August 28, 2023 deposition of Dr. Craig Powell and produced by Plaintiffs with the bates-stamp PEARSON_01196 to _01199.

142. Attached hereto as **Exhibit 141** is a true and correct copy of Organisation for Economic Co-operation and Development, *Guiding Principles and Key Elements for Establishing a Weight of Evidence for Chemical Assessment*, Series on Testing and Assessment No. 311, Environment, Health and Safety Division, Environment Directorate (2019).

143. Attached hereto as **Exhibit 142** is a true and correct copy of Neha S. Anand et al., *Perinatal Acetaminophen Exposure and Childhood Attention-Deficit/Hyperactivity Disorder (ADHD): Exploring the Role of Umbilical Cord Plasma Metabolites in Oxidative Stress Pathways*, 11 Brain Sci. 1 (2021).

144. Attached hereto as **Exhibit 143** is a true and correct copy of Rodrigo Moreno Klein et al., *Gestational Exposure to Paracetamol in Rats Induces Neurofunctional Alterations in the Progeny*, 70 Neurotoxicology & Teratology 1 (2020).

145. Attached hereto as **Exhibit 144** is a true and correct copy of Rodrigo Moreno Klein et al., *Gestational Paracetamol Exposure Induces Core Behaviors of Neurodevelopmental Disorders in Infant Rats and Modifies Response to a Cannabinoid Agonist in Females*, 99 *Neurotoxicology & Teratology* 1 (2023).

146. Attached hereto as **Exhibit 145** is a true and correct copy of Rachel Shirley et al., *Oxidative Stress and the Use of Antioxidants in Stroke*, 3 *Antioxidants* 472 (2014).

147. Attached hereto as **Exhibit 146** is a true and correct copy of Kezia A. Addo et al., *Acetaminophen Use During Pregnancy and DNA Methylation in the Placenta of the Extremely Low Gestational Age Newborn (ELGAN) Cohort*, 5 *Env't Epigenetics* 1 (2019).

148. Attached hereto as **Exhibit 147** is a true and correct copy of the email thread between Rachel Weinstein and Jesse Berlin (2014), which was Exhibit 9 to the May 19, 2023 deposition of Rachel Weinstein and produced by Johnson & Johnson Consumer, Inc. as bates-stamp APAP-JJC1-0000014435 to -0000014439.

149. Attached hereto as **Exhibit 148** is a true and correct copy of C.J. Carter & R.A. Blizard, *Autism Genes are Selectively Targeted by Environmental Pollutants Including Pesticides, Heavy Metals, Bisphenol A, Phthalates and Many Others in Food, Cosmetics or Household Products*, 101 *Neurochemistry Int'l* 83 (2016).

150. Attached hereto as **Exhibit 149** is a true and correct copy of Svetlana Dimova et al., *Acetaminophen Decreases Intracellular Glutathione Levels and Modulates Cytokine Production in Human Alveolar Macrophages and Type II Pneumocytes in Vitro*, 37 *Int'l J. Biochemistry & Cell Biology* 1727 (2005).

151. Attached hereto as **Exhibit 150** is a true and correct copy of Shekiba Eslamimehr et al., *Association of Prenatal Acetaminophen Use and Acetaminophen Metabolites with DNA*

Methylation of Newborns: Analysis of Two Consecutive Generations of the Isle of Wight Birth Cohort, 8 *Env't Epigenetics* 1 (2022).

152. Attached hereto as **Exhibit 151** is a true and correct copy of John A.H. Forrest et al., *Clinical Pharmacokinetics of Paracetamol*, 7 *Clinical Pharmacokinetics* 93 (1982).

153. Attached hereto as **Exhibit 152** is a true and correct copy of Kristina Gervin et al., *Long-term Prenatal Exposure to Paracetamol is Associated with DNA Methylation Differences in Children Diagnosed with ADHD*, 9 *Clinical Epigenetics* 1 (2017).

154. Attached hereto as **Exhibit 153** is a true and correct copy of Maria Luisa Miranda Guisado et al., *Abnormal Levels of Antioxidant Defenses in a Large Sample of Patients with Hypertensive Disorders of Pregnancy*, 35 *Hypertension Rsch.* 274 (2012).

155. Attached hereto as **Exhibit 154** is a true and correct copy of Elina Kumpulainen et al., *Paracetamol (Acetaminophen) Penetrates Readily Into the Cerebrospinal Fluid of Children After Intravenous Administration*, 119 *Pediatrics* 766 (2007).

156. Attached hereto as **Exhibit 155** is a true and correct copy of Alice Küster et al., *Cord Blood Glutathione Depletion in Preterm Infants: Correlation with Maternal Cysteine Depletion*, 6 *PLoS ONE* 1 (2011).

157. Attached hereto as **Exhibit 156** is a true and correct copy of Gerhard Levy et al., *Pharmacokinetics of Acetaminophen in the Human Neonate: Formation of Acetaminophen Glucuronide and Sulfate in Relation to Plasma Bilirubin Concentration and d-Glucaric Acid Excretion*, 55 *Pediatrics* 818 (1975).

158. Attached hereto as **Exhibit 157** is a true and correct copy of Jinyu Li et al., *Decoding MicroRNAs in Autism Spectrum Disorder*, 30 *Molecular Therapy: Nucleic Acids* 535 (2022).

159. Attached hereto as **Exhibit 158** is a true and correct copy of Won-Jun Lim et al., *Identification of DNA-Methylated CpG Islands Associated with Gene Silencing in the Adult Body Tissues of the Ogye Chicken Using RNA-Seq and Reduced Representation Bisulfite Sequencing*, 10 *Frontiers in Genetics* (2019).

160. Attached hereto as **Exhibit 159** is a true and correct copy of Paola Mian et al., *Physiologically Based Pharmacokinetic Modeling to Characterize Acetaminophen Pharmacokinetics and N-Acetyl-p-Benzoquinone Imine (NAPQI) Formation in Non-Pregnant and Pregnant Women*, 59 *Clinical Pharmacokinetics* 97 (2020).

161. Attached hereto as **Exhibit 160** is a true and correct copy of Sorraya Nasim et al., *Relationship Between Antioxidant Status and Attention Deficit Hyperactivity Disorder Among Children*, 10 *Int'l J. Preventive Med.* 1 (2019).

162. Attached hereto as **Exhibit 161** is a true and correct copy of Joshua F. Nitsche et al., *Transplacental Passage of Acetaminophen in Term Pregnancy*, 34 *Am. J. Perinatology* 541 (2017).

163. Attached hereto as **Exhibit 162** is a true and correct copy of S.L. Nuttall et al., *The Impact of Therapeutic Doses of Paracetamol on Serum Total Antioxidant Capacity*, 28 *J. Clinical Pharmacy & Therapeutics* 289 (2003).

164. Attached hereto as **Exhibit 163** is a true and correct copy of William A. Oleckno, *Epidemiology Concepts and Methods* (2008).

165. Attached hereto as **Exhibit 164** is a true and correct copy of Emilie Willoch Olstad et al., *No Impact of Prenatal Paracetamol and Folic Acid Exposure on Cord Blood DNA Methylation in Children with Attention-Deficit/Hyperactivity Disorder*, 14 *Frontiers in Genetics* (2023).

166. Attached hereto as **Exhibit 165** is a true and correct copy of Ana M. Romero Otalvaro et al., *ASQ-3: Validation of the Ages and Stages Questionnaire for the Detection of Neurodevelopmental Disorders in Argentine Children*, 116 *Archivos Argentinos de Pediatría* 7 (2018).

167. Attached hereto as **Exhibit 166** is a true and correct copy of Inmaculada Posadas et al., *Acetaminophen Induces Apoptosis in Rat Cortical Neurons*, 5 *PLoS ONE* 12 (2010).

168. Attached hereto as **Exhibit 167** is a true and correct copy of Camila Rigobello et al., *Perinatal Exposure to Paracetamol: Dose and Sex-dependent Effects in Behaviour and Brain's Oxidative Stress Markers in Progeny*, 408 *Behav. Brain Res.* (2021).

169. Attached hereto as **Exhibit 168** is a true and correct copy of Chapter 1 of Timothy Lash et al., *Modern Epidemiology* (4th ed. 2021).

170. Attached hereto as **Exhibit 169** is a true and correct copy of Ajay Singh et al., *Ages and Stages Questionnaire: A Global Screening Scale*, 74 *Boletín Med. del Hosp. Infantil de México* 5 (2017).

171. Attached hereto as **Exhibit 170** is a true and correct copy of Nosratola D. Vaziri et al., *Induction of Oxidative Stress by Glutathione Depletion Causes Severe Hypertension in Normal Rats*, 36 *Hypertension* 142 (2000).

172. Attached hereto as **Exhibit 171** is a true and correct copy of Henrik Viberg et al., *Paracetamol (Acetaminophen) Administration During Neonatal Brain Development Affects Cognitive Function and Alters Its Analgesic and Anxiolytic Response in Adult Male Mice*, 138 *Toxicological Sciences* 139 (2014).

173. Attached hereto as **Exhibit 172** is a true and correct copy of Gerald G. Briggs et al., *Briggs's Drugs in Pregnancy and Lactation: A Reference Guide to Fetal and Neonatal Risk*

(12th ed. 2021), which was Exhibit 613 to the September 6, 2023 deposition of Dr. Jennifer Pinto-Martin.

174. Attached hereto as **Exhibit 173** is a true and correct copy of Hannah E. Laue et al., *Association Between Meconium Acetaminophen and Childhood Neurocognitive Development in GESTE, a Canadian Cohort Study*, 167 *Toxicological Scis.* 138 (2019).

175. Attached hereto as **Exhibit 174** is a true and correct copy of Fatemeh Fekar Gharamaleki et al., *Autism Screening Tests: A Narrative Review*, 11 *J. of Pub. Health Rsch.* 2308 (2022).

176. Attached hereto as **Exhibit 175** is a true and correct copy of Samantha E. Parker et al., *Maternal Acetaminophen Use During Pregnancy and Childhood Behavioural Problems: Discrepancies Between Mother- and Teacher-Reported Outcomes*, 34 *Paediatric Perinatal Epidemiology* 299 (2019).

177. Attached hereto as **Exhibit 176** is a true and correct copy of Kosuke Inoue et al., *Behavioral Problems at Age 11 Years After Prenatal and Postnatal Exposure to Acetaminophen: Parent-Reported and Self-Reported Outcomes*, 190 *Am. J. Epidemiology* 1009 (2021).

178. Attached hereto as **Exhibit 177** is a true and correct copy of an email chain with the subject “RE: acetaminophen and autism” dated February 23 to 28, 2012, which Johnson & Johnson Consumer, Inc. produced as bates-stamp APAP-JJCI-0000465427 to -0000465429.

179. Attached hereto as **Exhibit 178** is a true and correct copy of Audio Excerpt: Dr. Wendy Chung, SPARK Presentation (2018).

180. Attached hereto as **Exhibit 179** is a true and correct copy of Mari Spildrejorde et al., *Multi-omics Approach Reveals Dysregulated Genes During hESCs Neuronal Differentiation Exposure to Paracetamol*, 26 *iScience* 1 (2023).

181. Attached hereto as **Exhibit 180** is a true and correct copy of Anders Hay-Schmidt et al., *Prenatal Exposure to Paracetamol/Acetaminophen and Precursor Aniline Impairs Masculinisation of Male Brain and Behaviour*, 154 *Reprod., Bioscientifica* 145 (2017).

182. Attached hereto as **Exhibit 181** is a true and correct copy of Pablo Hurtado-Gonzalez et al., *Effects of Exposure to Acetaminophen and Ibuprofen on Fetal Germ Cell Development in Both Sexes in Rodent and Human Using Multiple Experimental Systems*, 126 *Env't Health Perspectives* 1 (2018).

183. Attached hereto as **Exhibit 182** is a true and correct copy of Gaëtan Philippot et al., *A Cannabinoid Receptor Type 1 (CB1R) Agonist Enhances the Developmental Neurotoxicity of Acetaminophen (Paracetamol)*, 166 *Toxicological Scis.* 203 (2018).

184. Attached hereto as **Exhibit 183** is a true and correct copy of Liam M. Koehn et al., *Effects of Paracetamol (Acetaminophen) on Gene Expression and Permeability Properties of the Rat Placenta and Fetal Brain, Version 2*, 9 *F1000Research* 1 (2020).

185. Attached hereto as **Exhibit 184** is a true and correct copy of Florianne Tschudi-Monnet et al., *Binding of Electrophilic Chemicals to SH(thiol)-Group or Proteins and/or to Seleno-Proteins Involved in Protection Against Oxidative Stress During Brain Development Leading to Impairment of Learning and Memory*, *OECD Series on Adverse Outcome Pathways* No. 20 (2022).

186. Attached hereto as **Exhibit 185** is a true and correct copy of David S. Moore & David Shenk, *The Heritability Fallacy*, 8 *Wiley Interdisc. Revs. Cognitive Sci.* 1 (2016), <https://doi.org/10.1002/wcs.1400>.

187. Attached hereto as **Exhibit 186** is a true and correct copy of TJC Polderman et al., *The Co-Occurrence of Autistic and ADHD Dimensions in Adults: an Etiological Study in 17,770 Twins*, 4 Translational Psychiatry e435 (2014).

188. Attached hereto as **Exhibit 187** is a true and correct copy of *Gene and Environment Interaction*, National Institute of Environmental Health Sciences (Oct. 10, 2023, 9:46 AM), <https://www.niehs.nih.gov/health/topics/science/gene-env/index.cfm>, which was Exhibit 319 to the August 30, 2023 deposition of Dr. Wendy Chung.

189. Attached hereto as **Exhibit 188** is a true and correct copy of excerpts from the May 26, 2023 deposition transcript of Leslie Shur.

190. Attached hereto as **Exhibit 189** is a true and correct copy of Prescribing Information, Ultracet–tramadol hydrochloride and acetaminophen tablet, Janssen Pharmaceuticals, Inc. (initial U.S. approval 2001), which was Exhibit 915b to the August 9, 2023 deposition of Dr. Mary D’Alton.

191. Attached hereto as **Exhibit 190** is a true and correct copy of U.S. Department of Health and Human Services, *S5 (R3) Detection of Reproductive and Developmental Toxicity for Human Pharmaceuticals, Guidance for Industry* (May 2021).

192. Attached hereto as **Exhibit 191** is a true and correct copy of Christopher Harshaw & Anna G. Warner, *Interleukin-1 β -Induced Inflammation and Acetaminophen During Infancy: Distinct and Interactive Effects on Social-Emotional and Repetitive Behavior in C57BL/6J Mice*, 220 Pharmacology, Biochemistry & Behav. 1 (2022).

193. Attached hereto as **Exhibit 192** is a true and correct copy of F. Kyle Satterstrom et al., *Autism Spectrum Disorder (ASD) and Attention-Deficit/Hyperactivity Disorder (ADHD) Have a Similar Burden of Rare Protein-Truncating Variants*, 22 Nature Neuroscience 1961 (2019).

194. Attached hereto as **Exhibit 193** is a true and correct copy of Ann Z. Bauer & David Kriebel, *Prenatal and Perinatal Analgesic Exposure and Autism: an Ecological Link*, 12 *Env't Health* 1 (2013).

195. Attached hereto as **Exhibit 194** is a true and correct copy of Wendy Chung, *Is Autism Genetic?*, SPARK Presentation (Feb. 21, 2017).

196. Attached hereto as **Exhibit 195** is a true and correct copy of *Adverse Outcome Pathway Database (AOP-DB)*, U.S. EPA (Oct. 10, 2023, 10:24 AM), <https://www.epa.gov/healthresearch/adverse-outcome-pathway-database-aop-db>.

197. Attached hereto as **Exhibit 196** is a true and correct copy of Stephen V. Faraone, *An Overview of Attention Deficit Hyperactivity Disorder*, Slide Presentation (2022), which was Exhibit 771 to the September 7, 2023 deposition of Stephen Faraone.

198. Attached hereto as **Exhibit 197** is a true and correct copy of Stephen V. Faraone et al., *Attention-deficit/hyperactivity Disorder*, 1 *Nature Revs.* 1 (2015), which was Exhibit 778 to the September 7, 2023 deposition of Stephen Faraone.

199. Attached hereto as **Exhibit 198** is a true and correct copy of *Emery and Rimoin's Principles and Practice of Medical Genetics and Genomics* (Reed E. Pyeritz et al. eds., 7th ed. 2019).

200. Attached hereto as **Exhibit 199** is a true and correct copy of Yuhei Nishimura et al., *Review Article: Oxidative Stress as a Common Key Event in Developmental Neurotoxicity*, 2021 *Oxidative Med. & Cellular Longevity* 1 (2021).

201. Attached hereto as **Exhibit 200** is a true and correct copy *Internal Review Charge Questions – February 2018*, which was Exhibit 16 to the August 3, 2023 deposition of Dr. Robert Cabrera.

Dated: October 10, 2023

Respectfully submitted,

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